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Attorney for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)

Plaintiff,) Case No. 2:15-cr-0178-LDG-GWF

V.

NAJEEB RAHMAN,

Defendant.

Case No. 2:15-cr-0178-LDG-GWF

**STIPULATION TO CONTINUE
DEFENDANT'S SENTENCING HEARING**

(First Request)

Certification: In accordance with Local Rule 12-1(c), the parties, by and through undersigned counsel, certify that this stipulation is timely filed.

Pursuant to this Court's Local Rule 45-1, the parties respectfully request that the Court approve this stipulation to continue Defendant's sentencing hearing, currently scheduled for January 11, 2016, by at least 30-days or to a date no earlier than February 11, 2016. This is the parties' first request for a continuance for the purpose identified herein.

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1 In support of this stipulation, the parties rely upon the following points:

2 1. On October 1, 2015, Defendant entered a plea of "guilty" to count one of an
3 information filed with the Court that same day. This was in accordance with the terms of a plea
4 agreement entered into between the parties and filed with the Court. The Court accepted
5 Defendant's plea and set this matter for "Sentencing and disposition" on January 11, 2016.

6 2. The parties have discussed this matter and agree that a short continuance of the
7 current sentencing date is appropriate. Counsel for Defendant has advised government counsel
8 that under the current schedule, he will not have sufficient time to prepare for sentencing.
9 Specifically, counsel for Defendant has advised that during the first two weeks he will be very
10 busy with several key depositions in a significant civil case pending before this Court.¹
11 Additionally, according to defense counsel, during the second half of January 2016 he will be
12 busy preparing for a criminal trial in state court. In light of these and other competing case
13 commitments, defense counsel does not believe he will have sufficient time to prepare for the
14 sentencing scheduled in this case for January 11, 2016.

15 3. Counsel for Defendant has advised government counsel that he has discussed this
16 matter with Defendant who agrees that a continuance of sentencing in this case is appropriate for
17 the reasons set forth herein.

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25 ¹ Shendonna McLaine v. Clark County, Nevada et. al., 2:14-cv-0288-JAD-GWF.

4. Should the Court approve this stipulation and continue the current date set for sentencing in this case by at least 30-days, counsel for Defendant believes he will have sufficient time to prepare for the hearing.

The parties respectfully request that the Court approve this stipulation.

Respectfully submitted,

/s/ Kimberly Frayn

/s/ Paul S. Padda

Kimberly Frayn, Esq.
Assistant United States Attorney
Attorney for the United States

Paul S. Padda, Esq.
The Federal Defenders Law Group

Dated: December 30, 2015

Dated: December 30, 2015

IT IS SO ORDERED:

The parties stipulation to continue the date for sentencing in this matter is hereby approved. Sentencing and disposition in this case is hereby continued to the following date and time:

Date: Thursday, February 18, 2016

Time: 10:00 a.m. in courtroom 6B

UNITED STATES DISTRICT JUDGE
LLOYD D. GEORGE

Dated: 17 January 2016

CERTIFICATE OF SERVICE

In compliance with the Court's Local Rules, the undersigned hereby certifies that on December 30, 2015 a copy of the foregoing document, "STIPULATION TO CONTINUE DEFENDANT'S SENTENCING HEARING" was served (via the Court's CM/ECF system) upon counsel of record for the United States.

/s/ Paul S. Padda

Paul S. Padda, Esq.